

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Case No. 05 11304 RGS

CHRISTINE MONAHAN, )  
Plaintiff )  
v. )  
NATIONAL RAILROAD PASSENGER CORPORATION,)  
d/b/a AMTRAK, )  
Defendant )

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

**AGENDA OF MATTERS TO BE DISCUSSED AT THE SCHEDULING CONFERENCE**

1. Pre-discovery disclosures.

By December 20, 2005 the parties shall comply with Local Rule 26.2(A) and produce to each other copies of all relevant, non-privileged documents. The parties also agree to a continuing obligation to supplement their production if further investigation or refinement of the issues warrants such production.

2. Proposed discovery deadlines.

- a. Written discovery and all non-expert depositions will be complete by May 1, 2006.
- b. Plaintiff will designate expert witnesses, together with the submission of a report or interrogatory answer complying with Rule 26(b) by June 1, 2006.
- c. Defendant will designate expert witnesses together with the submission of a report or interrogatory answer complying with Rule 26(b) by July 1, 2006.

- d. Depositions of expert witnesses shall be permitted at the request of the opposing party and will be complete by September 15, 2006. The parties may take videotaped depositions pursuant to the rules.
- e. General discovery shall close October 1, 2006.

3. Dispositive Motions.

Motions for summary judgment shall be filed no later than November 1, 2006.

4. Case Management Conferences.

- a. The parties request a status conference in September 2006.
- b. The Court may schedule the final pretrial conference for any time after its ruling on any final dispositive motions served November 1, 2006.

5. Trial by magistrate.

At this time the parties do not consent to trial by magistrate judge.

6. Certification.

The parties have conferred with their respective clients regarding the establishment of a budget for litigation and alternative dispute resolution and will provide certifications attesting to this at the scheduling conference.

Respectfully submitted,

Plaintiff Christine Monahan  
By her attorneys,



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Defendant National Railroad Passenger Corporation,  
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By its attorneys,



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Date: November 23, 2005